

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**ORDER GRANTING THE FTX RECOVERY TRUST’S OMNIBUS
MOTION TO SUBSTITUTE PLAINTIFFS IN ADVERSARY PROCEEDINGS**

Upon the motion (the “Motion”)² of the Consolidated Wind Down Trust (the “FTX Recovery Trust”), for entry of an order (this “Order”) pursuant to Federal Rule of Civil Procedure 25, made applicable by Federal Rule of Bankruptcy Procedure 7025, substituting the FTX Recovery Trust as the plaintiff for any Debtor in the adversary proceedings listed in Exhibit 1 (the “Adversary Proceedings”); and this Court having jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Motion and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms not defined herein shall have the meaning attributed to them in the Motion.

that no other or further notice is necessary; and objections (if any) to the Motion having been withdrawn, resolved or overruled on the merits; and this Court having found and determined that the relief set forth in this Order is in the best interests of the FTX Recovery Trust; and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED:

1. The Motion is GRANTED.
2. The FTX Recovery Trust is substituted as plaintiff for all Debtors in the Adversary Proceedings listed in Exhibit 1 attached hereto.
3. The form of *Notice of Substitution of Plaintiff* attached hereto as Exhibit 2 is approved and counsel to the FTX Recovery Trust is authorized to file the *Notice of Substitution of Plaintiff* in each of the Adversary Proceedings, modified as appropriate.
4. Upon the filing of the *Notice of Substitution of Plaintiff*, the Clerk of Court respectfully is requested to amend the caption in each of the Adversary Proceedings to identify the FTX Recovery Trust as plaintiff replacing all Debtors.
5. For the avoidance of doubt, nothing in this Order shall affect the validity of the service of documents in any Adversary Proceeding with the original caption and parties.

Dated: _____
Wilmington, Delaware

The Honorable John T. Dorsey
Chief United States Bankruptcy Judge

EXHIBIT 1

EXHIBIT 1**Adversary Proceedings**

	Case Name	Adv. Pro. No.
1.	<i>Alameda Research Ltd., et al. v. Rocket Internet Capital Partners II SCS, et al.</i>	23-50379
2.	<i>Alameda Research Ltd. et al. v. Giles et al.</i>	23-50380
3.	<i>Alameda Research Ltd et al. v. Kives et al.</i>	23-50411
4.	<i>Alameda Research Ltd. et al. v. Daniel Friedberg</i>	23-50419
5.	<i>Alameda Research Ltd. et al. v. Platform Life Sciences Inc., et al.</i>	23-50444
6.	<i>Alameda Research Ltd. et al. v. Samuel Bankman-Fried, et al.</i>	23-50448
7.	<i>FTX Trading Ltd. et al. v. LayerZero Labs Ltd. et al</i>	23-50492
8.	<i>Alameda Research LLC, et al. v. Allan Joseph Bankman and Barbara Fried</i>	23-50584
9.	<i>Alameda Research Ltd. v. Mek Global Limited et al.</i>	24-50181
10.	<i>Alameda Research Ltd. v. Gate Technology Incorporated, et al.</i>	24-50184
11.	<i>FTX Trading Ltd., et al. v. Genesis Block Ltd., et al.</i>	24-50185
12.	<i>FTX Trading Ltd., et al. v. Ryan Salame</i>	24-50186
13.	<i>Alameda Research Ltd. v. Dunamu Inc.</i>	24-50187
14.	<i>Alameda Research Ltd. v. Foris DAX MT Ltd., et al.</i>	24-50188
15.	<i>FTX Trading Ltd., et al. v. American Action Network, Inc.</i>	24-50189
16.	<i>FTX Trading Ltd., et al. v. American Prosperity Alliance</i>	24-50190
17.	<i>FTX Trading Ltd. et al. v. American Values Coalition, Inc.</i>	24-50191
18.	<i>FTX Trading Ltd., et al. v. Common Sense Leadership Fund, Inc.</i>	24-50192
19.	<i>FTX Trading Ltd., et al. v. Congressional Leadership Fund</i>	24-50193
20.	<i>FTX Trading Ltd., et al. v. Fair Democracy</i>	24-50194
21.	<i>FTX Trading Ltd., et al. v. FWD.us</i>	24-50195
22.	<i>FTX Trading Ltd., et al. v. Heartland Resurgence Action</i>	24-50196
23.	<i>Clifton Bay Investments LLC, et al. v. Farmington State Corporation, et al.</i>	24-50197
24.	<i>FTX Trading Ltd., et al. v. Nawaaz Mohammad Meerun</i>	24-50198
25.	<i>FTX Trading Ltd., et al. v. New York Solidarity Network</i>	24-50199
26.	<i>FTX Trading Ltd., et al. v. One Nation, Inc.</i>	24-50200
27.	<i>FTX Trading Ltd., et al. v. Prosperity Alliance, Inc.</i>	24-50201
28.	<i>FTX Trading Ltd., et al. v. Senate Leadership Fund</i>	24-50202
29.	<i>FTX Trading Ltd., et al. v. Voto Latino Inc.</i>	24-50203
30.	<i>FTX Trading Ltd., et al. v. Working America</i>	24-50204
31.	<i>FTX Trading Ltd., et al. v. SkyBridge Capital II, LLC, et</i>	24-50209

	Case Name	Adv. Pro. No.
	<i>al.</i>	
32.	<i>West Realm Shires, Inc. v. Matthew Ness, et al.</i>	24-50210
33.	<i>FTX Trading Ltd., et al. v. SecureBio, Inc.</i>	24-50211
34.	<i>FTX Trading Ltd., et al. v. The Goodly Institute</i>	24-50212
35.	<i>FTX Trading Ltd., et al. v. Spartz Philanthropies, et al.</i>	24-50213
36.	<i>FTX Trading Ltd., et al. v. Manifold Markets, Inc.</i>	24-50214
37.	<i>Alameda Research Ltd., et al. v. Silver Miller Law</i>	24-50215
38.	<i>Alameda Research Ltd., et al. v. Neil Patel, et al.</i>	24-50216
39.	<i>FTX Trading Ltd., et al. v. On Ten Productions Limited</i>	24-50217
40.	<i>Alameda Research Ltd. v. MEXC Global Ltd.</i>	24-50218
41.	<i>FTX Trading Ltd., et al. v. Huobi Global Ltd., et al.</i>	24-50219
42.	<i>FTX Trading Ltd. v. Deng Jun, et al.</i>	24-50220
43.	<i>Alameda Research Ltd. v. Aleksandr Sasha Ivanov, et al.</i>	24-50221
44.	<i>FTX Trading Ltd. et al. v. Binance Holdings Limited, et al.</i>	24-50222
45.	<i>Macluarin Investments Ltd. v. Workplay Ventures LLC and OL Ventures LLC</i>	24-50300

EXHIBIT 2

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

FTX RECOVERY TRUST

Plaintiff,

- against -

[DEFENDANT(S)],

Defendant.

Adv. Pro. No. [●] (JTD)

NOTICE OF SUBSTITUTION OF PLAINTIFF

PLEASE TAKE NOTICE that on October 8, 2024, the United States Bankruptcy Court for the District of Delaware (the “Court”) entered an order (the “Confirmation Order”) confirming the *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates* [D.I. 26404] (the “Plan”), which became effective on January 3, 2025 [D.I. 29127] (the “Effective Date”).²

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms not defined herein shall have the meaning attributed to them in the Plan.

PLEASE TAKE FURTHER NOTICE that the Plan and Confirmation Order provide that, on the Effective Date, all of the Debtors' interests in the Adversary Proceedings were transferred to the FTX Recovery Trust.

PLEASE TAKE FURTHER NOTICE that on [DATE], the Court entered the *Order Granting the FTX Recovery Trust's Omnibus Motion to Substitute Plaintiffs in Adversary Proceedings* [D.I. ●] (the "Substitution Order") authorizing the FTX Recovery Trust to substitute in as Plaintiff for all Debtors and requesting that the Clerk of the Court amend the case caption in the above-captioned adversary proceeding (the "Adversary Proceeding") to identify the FTX Recovery Trust as Plaintiff replacing all Debtors.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Substitution Order, the FTX Recovery Trust is now a Plaintiff in the Adversary Proceeding, replacing any Debtor, and the case-caption of the Adversary Proceeding shall be amended as indicated above in this notice.

Dated: _____, 2025
Wilmington, Delaware

LANDIS RATH & COBB LLP

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